

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

HALIMAH BARLOW,

Plaintiff,

v.

HONG BIN ZHANG, individually;
LINK US TRANSPORTATION, INC.,
and AMERIAN SENTINEL
INSURANCE COMPANY,

Defendants.

CIVIL ACTION FILE
NUMBER

JURY TRIAL DEMANDED.

DEFENDANTS' NOTICE OF REMOVAL

1.

Plaintiff, Halimah Barlow, filed civil action file number 22-EV-001664 against Defendants Hong Bin Zhang, Link US Transportation, Inc., and American Sentinel Insurance Company in the State Court of Fulton County, Georgia on March 14, 2022. Defendants attached copies of the Summons and Complaint as Exhibit "A" and Defendants' Answer as Exhibit "B."

2.

Plaintiff was a citizen and resident of Georgia when she filed the Summons and Complaint for Damages. (Complaint, ¶ 1).

3.

At the time of the filing of the Complaint, Defendant Hong Bin Zhang was a citizen and resident of California. (Complaint, ¶ 2; Answer, ¶ 2).

4.

At the time of filing of the Complaint, Defendant Link US Transportation, Inc. was California corporation with a principal place of business therein. (See California Secretary of State records Exhibit C).

5.

At the time of filing of the Complaint, Defendant American Sentinel Insurance Company, maintains a principal place of business in the state of Pennsylvania. (See Georgia Secretary of State records Exhibit D).

6.

The foregoing action is properly removable to this Court pursuant to 28 U.S.C. § 1441(a), 28 U.S.C. § 1446(a) and (b). In accordance with 28 U.S.C. § 1332(a), there exists diversity of citizenship between the Plaintiff and the properly served Defendants and the amount in controversy, exclusive of interest and cost, exceeds the sum of \$75,000.

7.

To support their contention of the amount in controversy Defendants show on June 10, 2022, the Plaintiff served her discovery responses in which she claims \$80,313.04 in special damages exclusive of any claims for non-economic damages. See Exhibit E.

8.

On Friday, Monday June 27, 2022, the Plaintiff also demanded \$100,000.00 to settle this matter.

9.

All Defendants whom Plaintiff properly served with the Summons and Complaint consent to the removal of this civil action.

10.

Notice is hereby given, within thirty days after receipt of documents and other information from which it may be ascertained the case is removable, in accordance with 28 U.S.C. § 1446 and pursuant to Fed. R. Civ. P. 11 of the removal of this action to this Court.

DENNIS, CORRY, SMITH & DIXON, LLP

/s/ John Dixon

JOHN D. DIXON, ESQ.

Georgia bar number 223376

/s/ Stephen K. McDonald

STEPHEN K. MCDONALD, ESQ.

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CERTIFICATE OF SERVICE

I electronically filed this **DEFENDANTS' NOTICE OF REMOVAL** with the Clerk of Court using the CM/ECF system which will automatically send notification of such filing to the following:

Ross Moore II
Chelsea Heron
Ross Moore II, P.C.
309 N. Highland Ave. NE, Ste. A
Atlanta, GA 30307

I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: None.

This 29th day of June, 2022.

/s/ John D. Dixon
JOHN D. DIXON, ESQ.
For the Firm

